

STATE OF SOUTH DAKOTA
: SS
COUNTY OF MINNEHAHA

IN CIRCUIT COURT
SECOND JUDICIAL CIRCUIT
MAGISTRATE DIVISION

STATE OF SOUTH DAKOTA,
Plaintiff
vs.

CHRISTOPHER WILLIAM BRUCE,
Defendant.

PD18-038672

COMPLAINT

CR19-4185

COUNT 1: STALKING (HARASS BY COMMUNICATION) - CLASS 1 MISD

The undersigned being first duly sworn on oath complains and charges:

COUNT 1

That the Defendant, CHRISTOPHER WILLIAM BRUCE, in Minnehaha County, State of South Dakota, on or about the 16th day of November, 2018 and the 5th day of June, 2019, did commit the public offense of Stalking (SDCL 22-19A-1(3)) in that the Defendant did willfully, maliciously, and repeatedly harass another person, PAUL TEN HAKEN, by means of any verbal, electronic, digital media, mechanical, telegraphic, or written communication, contrary to the form of the statute in such case made and provided and against the peace and dignity of the State of South Dakota.

Cynthia
(Deputy) States Attorney
Minnehaha County, South Dakota

Subscribed and sworn to before me this 6th day of June, 2019.

Janet M. Eden
My commission expires 09/24/2020

JANET M. EDEN

SEAL NOTARY PUBLIC SOUTH DAKOTA SEAL

REQUEST FOR ARREST WARRANT

THE UNDERSIGNED ATTORNEY
HEREBY REQUEST AN ARREST
WARRANT BE ISSUED BASED ON
THE ABOVE COMPLANT

Cynthia

Initial Appearance Date:

DOB:

Address:

Arresting Officer: KOOISTRA, S. *se*

FILED
JUN 06 2019

Minnehaha County, S.D. Page 1 of 1
Clerk Circuit Court

IN CIRCUIT COURT
SECOND JUDICIAL CIRCUIT

STATE OF SOUTH DAKOTA

VS.

AFFIDAVIT IN SUPPORT
OF ARREST WARRANT

ORIG. 4185

Defendant.

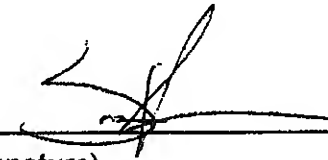
Sergeant Sean Kooistra, being first duly sworn on oath, deposes and states that he is a Detective Sergeant of the Sioux Falls Police Department and states that he is one of the officers in charge of the investigation of the above-styled matter. That your Affiant makes this Affidavit in support of the State's Attorney's request for a warrant for the arrest of the above-named Defendant(s), and in compliance with SDCL 23A-2-2, and states as follows:

1. On 11/19/2018, your affiant was made aware of a subject that had sent a concerning message to the City of Sioux Falls Mayor Paul Ten Haken. The message was sent on 11/16/2018. The subject was identified as Christopher William Bruce, DOB: [REDACTED] and will be referred to as the defendant hereafter. Mayor Ten Haken will be referred to as the victim hereafter. A Sioux Falls Police Department report was then created under case number PD18-038672.
2. While reviewing the message, your affiant discovers that the defendant makes statements related to the defendant researching the victim's personal life to include making mention of the victim's family to include the victim's children. The message was sent via the Citizen Request Management system which is a messaging service provided by the City of Sioux Falls for citizens to contact city departments. This message was sent to the Mayor's office and includes the greeting, "Hey, Mayor 10!".
3. On 11/20/2018, your affiant had made phone contact with the defendant to discuss the context of the aforementioned statements. During the course of this conversation, your affiant had discussed with the defendant that written messages are often times difficult to interpret the intended meanings and a better option may be to relay his message to the city council via the public forum to which the defendant agreed. The defendant further advised that he would no longer message the victim directly.

4. On 11/22/2018, the defendant had sent an e-mail to the Sioux Falls City Council. In this e-mail, the defendant makes mention of speaking with your affiant. The defendant then states, "T' would seem that the mayor had a hair or two lift from his neck in fear..." as well as, "Evidently, the mayor got a little wake up call, because it hit home that maybe his family might find out that their son may be responsible for the deaths of the citizens of the city he's in charge of, someday".
5. On 03/24/2019, the defendant had sent an e-mail directly to the victim that included the statement, "I say you can fight city hall, you just need a bigger gun, better bullets and harder armor." Due to the threatening connotation of this statement, the victim was concerned and had notified the Sioux Falls Police Department.
6. Lt. Michael Colwill of the Sioux Falls Police Department had then made phone contact with the defendant to specifically address the aforementioned statement. Lt. Colwill advised the defendant that this statement could be viewed as threatening and that he should avoid that type of language in his communications or we will be forced to investigate him criminally, potentially arrest him and put him in jail. The defendant agreed to remove that statement from his correspondence.
7. On 05/17/2019, the defendant had sent an e-mail to the Sioux Falls City Council members in regards to the defendant speaking during the open forum section of the next City Council meeting. In it, the defendant makes the statement, "This is your notice that the next public input session is about to be the most explosive to date". Due to previous statements made by the defendant, to include needing a bigger gun and better bullets, the Sioux Falls Police Department was notified who, in turn, alerted the security detail assigned to the City Council meeting.
8. On, or about, 05/30/2019, the defendant had placed a posting online which included, "The Letter Sent to the Mayor" within its title. Within that posting, the defendant states, "I will make a SPECIAL effort to reach out to his family in MN to let them know, PER MY SAME INALIENABLE RIGHT, how absolutely wrong their son is behaving...and should I be touched, verbally or physically for this PROMISE, it will be added to this suit that is to be filed TODAY." This statement was concerning enough that the Worthington, MN Police Department was contacted so that special attention could be placed on the victim's family for their safety.


9. On 06/05/2019, the defendant had sent an e-mail directly to the victim which stated, "You guys may want to re-familiarize yourselves with what's been going on in my blog, of late. Spend now, or forever Fold Your Peas....because things are about to get real." The e-mail also included the aforementioned statement, "You can most certainly fight City Hall; you just need a bigger gun, better bullets, and bulletproof armor". Furthermore, the message also included the statements, "They say the pen is mightier than the sword. Therefore, I use my sword as my pen" and "There's nothing like a loose cannon in the crowd to keep you wondering from what direction all the damn cannonballs are coming from".

10. All of these events had taken place in Sioux Falls, Minnehaha County, South Dakota.

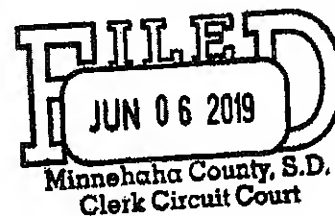
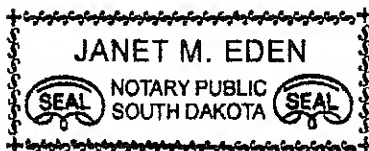


(Signature)

Subscribed and sworn before me
this 6th day of June, 2019.



Notary Public
ME 9-24-2020



STATE OF SOUTH DAKOTA
: SS
COUNTY OF MINNEHAHA

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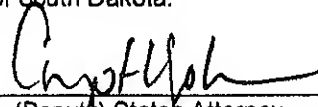
CEI 19-4185

COUNT 1: STALKING (HARASS BY COMMUNICATION) - CLASS 1 MISD

The undersigned, a Deputy States Attorney in and for the County of Minnehaha, in the name of, and by authority of the State of South Dakota, informs the court:

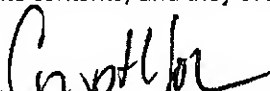
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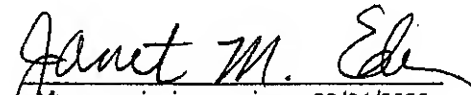

(Deputy) States Attorney
Minnehaha County, South Dakota

STATE OF SOUTH DAKOTA
:SS
COUNTY OF MINNEHAHA

The undersigned being first duly sworn on oath states: I am Deputy States Attorney for Minnehaha County, South Dakota; I have read the foregoing information; I know its contents; and they are true of my best knowledge and belief.

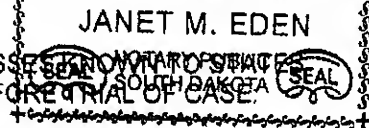

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Minnehaha County, South Dakota

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My commission expires: 09/24/2020

WITNESSES KNOWN TO THE STATES
ATTORNEY AT TIME OF FILING THIS
INFORMATION:
KOOISTRA, S.

OTHER WITNESSES KNOWN TO THE STATES
ATTORNEY BEFORE TRIAL OF CASE



FILED
JUN 06 2019
Minnehaha County, S.D.
Clerk Circuit Court

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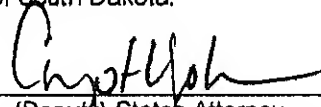
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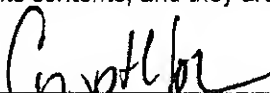
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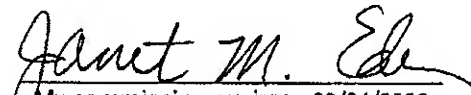

(Deputy) States Attorney
Minnehaha County, South Dakota

STATE OF SOUTH DAKOTA
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COUNTY OF MINNEHAHA

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Minnehaha County, South Dakota

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JANET M. EDEN

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Page 1 of 1